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Attorneys for Defendant  
CONFLUENT MEDICAL TECHNOLOGIES, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

DONALD G. HAUCK, an individual;  
BESSIE BLANKS, an individual;  
SHARON WILLEY, an individual;  
WILLIAM ROBERTS, an individual;  
JOHN SZYMANSKI, an individual;  
HERBERT BEENE, an individual;  
individual; BENJAMIN LENARD, an  
TRULA LEVINE, an individual; ROBIN  
DILLOW, an individual; STEPHANIE  
LASTRAPES-DENNIS, an individual;  
MICHAEL ROUX, SR., an individual;  
JOSEPH D. DOUCET, an individual;  
BRIAN ALFRED, an individual;  
GERALDINE CLARK, an individual,  
LORI GODFREY; an individual,

Plaintiffs,

v.

CORDIS CORPORATION, a corporation ;  
JOHNSON & JOHNSON, a corporation;  
CARDINAL HEALTH, INC., a  
corporation; CONFLUENT MEDICAL  
TECHNOLOGIES, INC., a corporation;  
and DOES 1 through 50,

Defendants.

Case No. 4:16-cv-05455-EMC

**STIPULATION TO EXTEND TIME FOR  
DEFENDANT CONFLUENT MEDICAL  
TECHNOLOGIES, INC. TO RESPOND TO  
COMPLAINT**

1 WHEREAS, Plaintiffs filed the Complaint in the Superior Court of California, County of  
2 Alameda on August 23, 2016;

3 WHEREAS, Defendant Confluent Medical Technologies, Inc. ("Confluent") was served  
4 with the Complaint on August 24, 2016;

5 WHEREAS, Defendant Cordis Corporation filed a Notice of Removal on September 23,  
6 2016;

7 WHEREAS, a conflict has arisen with respect to counsel for Confluent;

8 WHEREAS, due to this conflict, Confluent is in the process of retaining new counsel and  
9 requires additional time to prepare its response to the Complaint;

10 WHEREAS, Plaintiffs and Confluent have met and conferred through counsel and agree  
11 that, pursuant to Local Rule 6-1, Confluent's deadline to answer or otherwise respond to the  
12 Complaint shall be continued to November 14, 2016;

13 WHEREAS, the brief extension set forth herein will not alter the date of any event or any  
14 deadline already set by the Court in this action;

15 THEREFORE, IT IS HEREBY STIPULATED by Plaintiffs and Confluent through their  
16 respective counsel that the deadline for Confluent to answer or otherwise respond to the  
17 Complaint is continued to November 14, 2016.

18 IT IS SO STIPULATED.

19 Dated: October 13, 2016

DRINKER BIDDLE & REATH LLP

21 By: /s/ Matthew J. Adler

22 Michelle A. Childers

Matthew J. Adler

23 Attorneys for Defendant  
24 CONFLUENT MEDICAL TECHNOLOGIES,  
25 INC.  
26  
27  
28

1 Dated: October 13, 2016

LOPEZ MCHUGH LLP

3 By: /s/ Matthew Ramon Lopez

Ramon Rossi Lopez

Matthew Ramon Lopez

Amorina Patrice Lopez

Attorneys for Plaintiffs

6 **Attestation Pursuant to Civil Local Rule 5-1(i)**

7 Pursuant to Civil Local Rule 5-1(i), I, Matthew J. Adler, hereby attest that I have obtained  
8 concurrence in the filing of this document from the other signatory to this document.

9 I declare under penalty of perjury under the laws of the United States of America that the  
10 foregoing is true and correct. Executed this 13th day of October, 2016 in San Francisco,  
11 California.



13 /s/ Matthew J. Adler

14 Matthew J. Adler